

**SUPERFUND FACT SHEET
EPA REGION 4
ATLANTA, GEORGIA**



SITE: BROWN'S DUMP
BREAK: 4.10
OTHER: _____

PROPOSED PLAN

BROWN'S DUMP SUPERFUND ALTERNATIVE SITE

Jacksonville, Duval County, Florida

July 2005

This Fact Sheet is not considered a technical document, but it has been prepared to provide the general public a better understanding of the proposed activities at the Brown's Dump Site. Words appearing in **bold print** are defined in a glossary at the end of this publication.

INTRODUCTION

The U.S. Environmental Protection Agency (EPA) is issuing this **Proposed Plan** Fact Sheet for the Brown's Dump Site for several purposes:

- to provide a brief history of the Site
- to explain the proposed cleanup approach
- to provide the public with an opportunity to comment on the proposed cleanup approach.

EPA, in consultation with the Florida Department of Environmental Protection (FDEP), will finalize the **Record of Decision (ROD)** only after public comments have been considered.

EPA issues this Proposed Plan Fact Sheet as part of public participation requirements under Section 117(a) of the **Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or "Superfund")**. The Proposed Plan Fact Sheet summarizes information that can be found in greater detail in the 2003 Remedial Investigation (RI), the 2005 Feasibility Study (FS) and other documents contained in the **Administrative Record**. The Administrative Record and an **information repository** for the Brown's Dump Site can be found at the following location:

Clanzel T. Brown Center
4415 Moncrief Road
Jacksonville, Florida 32209

Public Meeting on Proposed Plan

Public Meeting: August 9, 2005 Time: 5:30 PM - 7:00 PM
Location: Clanzel T. Brown Center

Public Comment Period: July 28, 2005 through August 28, 2005
(See pages 12 and 13 for more information on Community Involvement)



HISTORY OF BROWN'S DUMP

The Brown's Dump Superfund Alternative Site ("the Site") is located in the City of Jacksonville and consists of the former Mary McLeod Bethune Elementary School, an electrical substation of the Jacksonville Electric Authority (JEA), surrounding single family homes and multiple family complexes (e.g., apartments).

The Site is approximately 50 acres in size. From the late 1940's until the mid-1950's, the Site was an operating landfill used to deposit ash from City of Jacksonville municipal incinerators. Investigations have indicated that ash is present within the Site at depths varying from the surface to, in some locations, greater than 20 feet below land surface (bls). After closure of the landfill in 1953, the property was obtained by the Duval County School Board in 1955, through condemnation procedures, for construction of a school. At approximately the same time and later, land surrounding the original landfill began to undergo development of residential homes and apartment complexes.

The original location of the dumping operation is centered on the northern portion of the former Mary McLeod Bethune Elementary School. School year 2000/2001 was the last operating school year.

In 1999, the EPA identified the City of Jacksonville, the Duval County School Board and JEA as Potentially Responsible Parties (PRPs). In September 1999, the City of Jacksonville voluntarily entered into an Administrative Order by Consent (AOC) with the EPA for the performance of a Remedial Investigation (RI) and Feasibility Study (FS). Therefore, this Site was never listed on the **National Priorities List (NPL)**; rather, it is a

Superfund Alternative Site (SAS) which, pursuant to the 1999 AOC, followed the **National Contingency Plan (NCP)** for the required investigation/study. Site cleanup is to be funded by the City of Jacksonville.

INVESTIGATION HISTORY

What ultimately became the Brown's Dump Site has been investigated numerous times over the years. The following is a summary of some key EPA actions and the involvement of the State of Florida prior to initiation of the RI/FS:

- Preliminary Assessment (PA), 1985 (EPA)
- EPA Re-Evaluation of the Site, 1994 (EPA)
- Emergency Response and Removal Branch Site Investigation, 1995 (EPA)
- Corrective Action Report (CAR), 1995 (FDEP)
- Expanded Site Inspection Report (ESI), 1998 (EPA)

Further information on the above investigations/actions can be found in the **Administrative Record**.

REMEDIAL INVESTIGATION (RI)

RI Phase I, 1999 - 2000

The purpose of the RI is to determine the nature and extent of contamination that exists at the Site. An RI/FS Kickoff public meeting was held on April 3, 2000. The Remedial Investigation Work Plan was reviewed by EPA, the Florida Department of Environmental Protection (FDEP) and the Technical Advisor for a local community organization called Community Organized for

Environmental Justice (COEJ). The plan was approved by EPA, and fieldwork for the Remedial Investigation, which consisted of soil, **groundwater** and surface water sampling, was conducted during the summer of 2000. The draft Remedial Investigation Report was submitted in October 2000.

After review of the October 2000 Remedial Investigation Report, further residential parcel-by-parcel (i.e., lot-by-lot) soil sampling was determined to be needed (i.e., Additional Remedial Investigation - Phase II).

RI Phase II, 2001 - 2002

The work plan for the additional Remedial Investigation soil sampling was reviewed by EPA and the State. COEJ was also provided the opportunity to review this plan. In August 2001, EPA approved the plan for the Phase II Remedial Investigation soil sampling. Field work for the additional soil sampling began October 22, 2001.

The sampling took longer than expected due to difficulties in obtaining signed Access Agreements. On two occasions (September/December 2001), the City mailed Access Agreements to properties targeted for the additional soil sampling. The first mailing went to the mailing address of the property targeted for sampling. The second mailing went to the owner/occupant at the physical address of the property. The second request from the City was followed by a December 2001 EPA Fact Sheet on the Access Agreement.

In January 2002, the EPA and the City walked through the neighborhood making contact with people who had not returned previous requests for access. During the walk through the community, questions on the Access Agreements and the importance of the additional sampling were answered.

In March 2002, U.S. Representative Corrine Brown sent a letter to individuals who had not signed the Access Agreements.

Representative Brown's letter encouraged people to sign the Access Agreement so sampling could take place to determine if incinerator ash and associated contaminated soil are present.

Approximately 70% of the yards (i.e., parcels) targeted for the additional soil sampling in Phase II provided access to be sampled and were sampled. With an acceptable number of parcels sampled in early 2002, the following major actions occurred:

- EPA called for the October 2000 Remedial Investigation to be rewritten to include the information collected during Phase II. The last Remedial Investigation Report is dated July 2003 (Revision 3).
- EPA held a Data Availability Session in October 2002 at the Moncrief Community Center to answer community questions on the results from Phase I and Phase II sampling.
- EPA finalized the Human Health Baseline Risk Assessment and the Ecological Risk Assessment in the fall of 2002.
- Additional background dioxin soil sampling was performed in late 2002 and early 2003.
- Additional groundwater sampling was performed in early 2003.

The above work allows the following broad conclusions to be drawn:

- Soil is contaminated by the Site.
- Groundwater is not contaminated by the Site
- Surface water is not contaminated by the Site.
- Sediment is not currently contaminated by the Site.

BASELINE HUMAN HEALTH RISK ASSESSMENT (BHHRA), 1999-2002

The Baseline Human Health Risk Assessment was performed by an EPA contractor, Black&Veatch, under an RI/FS Work Assignment. The BHHRA was approved by the EPA in October 2002. This document concludes that unacceptable risk exists for **contaminants of concern (COCs)** in soil and groundwater. COCs are individual constituents that the risk assessment has determined to present a possible risk to human health. The risks are well defined and there are no additional assessments required to develop **Remedial Goals (RGs)** for the identified COCs.

RGs are used in the Feasibility Study to define the areas to which the cleanup objective(s) apply. During the Proposed Plan, the RGs can be thought of as proposed cleanup levels.¹ The final COCs and associated cleanup levels for the Brown's Dump Site will be established in the **ROD**.

The Baseline Risk Assessment, along with subsequent field sampling results, allows the following conclusion to be drawn in relation to needed cleanup:

- Soil is contaminated at levels supportive of cleanup

The residential and industrial RGs for the human health COCs are shown in Tables 1 and 2, respectively.

¹ For example, the cleanup objective for a site with contaminated groundwater would be 'cleanup of groundwater to drinking water standards.' The specific drinking water standard for arsenic, 10 ppb, would be the RG.

**TABLE 1. HUMAN HEALTH SOIL
CONSTITUENTS OF CONCERN AND
RESIDENTIAL RGs**

Constituent of Concern	RG (mg/kg) *
Antimony	27
Arsenic	2.1
Barium	4,960
Cadmium	82
Copper	2,810
Lead	400
Manganese	3,500
Zinc	26,000
Aroclor-1260	0.5
Carcinogenic Polycyclic Aromatic Hydrocarbons	0.1
2,4,7,8, TCDD (Dioxin)	0.000007

Notes:

* If the background concentration for a specific constituent is above the RG identified above, then cleanup will be to the background concentration.

**TABLE 2. HUMAN HEALTH SOIL
CONSTITUENTS OF CONCERN AND
INDUSTRIAL RGs**

Constituent of Concern	RG (mg/kg) *
Antimony	370
Arsenic	12
Barium	130,000
Cadmium	1,700
Copper	89,000

Lead	1,400
Manganese	43,000
Zinc	630,000
Aroclor-1260	2.6 (Aroclor mixture)
Carcinogenic Polycyclic Aromatic Hydrocarbons	0.7
2,4,7,8, TCDD (Dioxin)	0.00003
Notes: * The above RGs are being used as the default RGs for Industrial Scenarios. If the background mean concentration for a specific constituents is above the RGs identified above, then cleanup will be to the background concentration.	

ECOLOGICAL RISK ASSESSMENT, 1999-2002

The Ecological Risk Assessment (ERA) was performed by an EPA contractor, Black&Veatch, under an RI/FS Work Assignment. The Ecological Risk Assessment was approved by the EPA in November 2002. This document concludes that sediment and surface water do not contain ecologically significant concentrations of contamination and are therefore not considered to be media of ecological concern at the site. However, comparison of preliminary ecological RGs to concentrations of **contaminants of potential ecological concern (COPEC)** in surface soil leads to the conclusion that surface soil presents a risk to terrestrial communities in the Site vicinity. The preliminary ecological RGs used in the ERA are reproduced in Table 3. The preliminary ecological RGs are intentionally designed to minimize the potential for the under-estimation of

ecological risk (i.e., the levels are very conservative and probably over-protective).

TABLE 3. CONSTITUENTS OF POTENTIAL ECOLOGICAL CONCERN IN SOIL

Constituent of Concern	Preliminary RG (mg/kg)
Aluminum	600
Antimony	5
Copper	61
Iron	200
Lead	400
Mercury	0.012
Zinc	200
4,4'-DDT	0.043

Further refinement of the above preliminary ecological RGs was possible. For example, many of the COPECs for soils are metals and other inorganic chemical that are naturally occurring in the environment. Some of the COPECs are organic chemicals that are also naturally occurring or ubiquitous in urban environments. To determine background concentrations of COPECs, soil sampling was performed. Surface soil was collected at a total of 60 background locations samples. In many cases, the background concentration of the COPEC was above the preliminary ecological RG (e.g., aluminum, iron, mercury). EPA does not require cleanup to below background levels.

With establishment of the environmental medium of concern (soil), identification of the COPECs and determination of surface soil background concentrations, an analysis was performed on the geographic co-location of human health COCs and ecological COPECs.

This analysis indicates that remediation of soils to human health RGs will remediate almost all of the exceedances of preliminary ecological RGs or soil background (whichever is higher). Remediation to human health RGs will remove or break the exposure pathway of a large amount of contaminated soil, thereby lowering the average concentration of ecological COPECs at the Site.

Due to the relatively low quality ecological habitat offered by urbanized settings, the ubiquitous nature of many of the ecological COPECs and the conservative nature of the preliminary ecological RGs, it is believed that those locations not targeted for soil cleanup to protect human health will not result in substantive remaining ecological risk and do not warrant establishment of specific ecological RGs.

The overall conclusion is that cleanup to satisfy the human health RGs along with the voluntary removal of ash > 25% will also provide adequate cleanup to protect ecological receptors (i.e., separate actions to address ecological risk in soil is not needed).

FEASIBILITY STUDY, 2002 - 2004

With the finalization of both Risk Assessments and completion of Phases I and II of the Remedial Investigation (i.e., with the sampling of a significant number of targeted parcels), the next step in the cleanup agreement with the City was performance of the Feasibility Study (FS). The purpose of the Feasibility Study is to evaluate realistic cleanup alternatives for the Site.

The following is a listing of the main events which have occurred with regard to the Feasibility Study:

- A Technical Memorandum dated November 2002 was submitted for review. This memo addressed the first three sections of the Feasibility Study. Review of this Technical Memorandum lead to the call in February 2003 for the full Feasibility Study.
- Feasibility Study (revision 0) was submitted in June 2003 and reviewed.
- Feasibility Study (revision 1) was submitted in October 2003 and reviewed.
- Feasibility Study (revision 2) was submitted in September 2004, revised twice and approved in 2005.

RI Phase III, 2003 - 2005

Around the time the June 2003 Feasibility Study was submitted, it was recognized that several provisions of Florida's risk based corrective action (RBCA) statute (F.S. §376.30701), enacted on June 20, 2003, would impact Superfund cleanups conducted in Florida. Impacts from this law (along with a desire to collect information needed for quicker implementation of the cleanup) necessitate an additional round of sampling at certain parcels (i.e., RI Phase III).

RI Phase III sampling actions are to occur concurrent with selection of the cleanup approach and remedial design activities. Information from this sampling event will be reviewed and used to identify any additional areas in need of cleanup.

SUMMARY OF REMEDIAL ALTERNATIVES

The FS evaluated the following possible remedial alternatives (see Table 4). The four alternatives were evaluated against the nine evaluation criteria outlined in Table 5.

TABLE 4. REMEDIAL ALTERNATIVES

1. No Further Action
2. Soil Cover with Excavation and Offsite Disposal
3. Shallow Excavation, Offsite Disposal and Soil Cover
4. Deep Excavation and Offsite Disposal

TABLE 5: CRITERIA FOR EVALUATING REMEDIAL ALTERNATIVES

In selecting a preferred cleanup alternative, EPA uses the following criteria to evaluate each alternative developed in the Focused Feasibility Study (FS).

Threshold Criteria - The first two criteria are essential and if not met, an alternative is not considered further.

1. Overall Protection of Human Health and the Environment -- Degree to which alternative eliminates, reduces, or controls health and environmental threats.
2. Compliance with **Applicable or Relevant and Appropriate Requirements (ARARs)** -- Assesses compliance with Federal/State requirements.

Balancing Criteria - The next five criteria are balancing criteria used to further evaluate all options that meet the first two criteria.

3. Long-Term Effectiveness -- How remedy maintains protection once cleanup goals have been met.
4. Reduction of Toxicity, Mobility, or Volume Through Treatment -- Expected performance of the treatment technologies to lessen harmful nature, movement, or amount of contaminants.
5. Implementability -- Technical feasibility and administrative ease of a remedy.
6. Short-Term Effectiveness -- Length of time for remedy to achieve protection and impact of implementing the remedy.
7. Cost -- Weighing of benefits of a remedy against the cost of implementation.

Modifying Criteria - The final two criteria are used to modify EPA's proposed plan after the public comment period has ended and comments from the community and the State have been received.

8. State Acceptance -- Consideration of State's opinion of EPA's proposed plan. EPA seeks state concurrence.
9. Community Acceptance -- Consideration of public comments on proposed plan.

DESCRIPTION OF REMEDIAL ALTERNATIVES

Remedial Action Objectives (RAOs) are specific cleanup objectives. For example, RAOs are site-specific goals for protecting human health and the environment established on the basis of the nature and extent of contamination, resources that are currently and potentially threatened, and the potential for human and environmental exposure. The following RAOs have been identified for the Brown's Dump Site:

- Prevent human exposure to site COCs through contact, ingestion, or inhalation of soil or surface water of Moncrief Creek contaminated from incinerator ash or other wastes disposed at the Brown's Dump Site with a carcinogenic risk greater than 1×10^{-6} (i.e., one in a million), with a noncarcinogenic hazard index greater than 1 and lead in excess of 400 mg/kg.²
- Prevent impacts to terrestrial biota from exposure to surface soils contaminated from incinerator ash or other wastes disposed at the Brown's Dump Site and containing chemicals of potential ecological concern (COPECs) in excess of

² The City of Jacksonville is voluntarily remediating soil with ash > 25%. This is not enforceable as a RAO as EPA RAOs are based on remediation of COCs above RGs.

- preliminary ecological RGs.³
- Control erosion and transport of soils containing visible ash,² lead in excess of 400 mg/kg or COPECs in excess of preliminary ecological RGs³ along the banks of Moncrief Creek to prevent possible unacceptable risks to human health or ecological impacts.

Remedial Goals (RGs) for residential and industrial settings were identified which meet the above RAOs (see Tables 1 and 2).⁴ During the Proposed Plan, the RGs can be thought of as proposed cleanup levels. The ROD will establish the final COCs and associated cleanup levels.

Remedial alternatives investigated to meet the RGs in Tables 1 and 2 are as follows:

Alternative 1: No Further Action

The no action alternative is included in the evaluation as a baseline comparison with the other remedies. This alternative involves no active remediation.

Alternative 2: Soil Cover with Excavation and Offsite Disposal

The remedial objectives would be met by Alternative 2 primarily by providing a 0.5 foot cover of uncontaminated soil over all parcels and areas exceeding RGs. This soil cover would prevent direct contact, ingestion or

³ Cleanup to satisfy the human health RGs along with the voluntary removal of ash > 25% will also provide adequate cleanup to protect ecological receptors (i.e., separate actions to address ecological risk in soil is not needed).

⁴ Recall from the discussion on ecological risk that the conclusion was that cleanup to human health RGs will also provide adequate cleanup to protect ecological receptors.

inhalation of surficial soils by people while also preventing impacts to terrestrial biota. Some excavation would be needed to allow for placement of the soil cover without creating storm water drainage problems or surface grade problems with fixed surface features or structures. Potential exposure to contaminated subsurface soil is to be addressed through administrative notices and restrictions on excavation of subsurface soil.

Soil below existing structures and roadways would not be removed. Erosion of soils exceeding RGs and ash located along the banks of Moncrief Creek is to be prevented in this alternative through stabilization of the banks of Moncrief Creek.

The estimated time to complete this alternative is 18 months.

The main components of Alternative 2 are as follows:

- Administrative notices and restrictions (i.e., **Institutional Controls**)
- Soil cover (with excavation where required) and offsite disposal
- Solidification/stabilization, as needed for proper offsite disposal
- Moncrief Creek bank stabilization

Alternative 3: Shallow Excavation, Offsite Disposal and Soil Cover

The RGs would be met under Alternative 3 by providing at least 2 feet of clean soil over all parcels and areas exceeding the RGs and application of administrative notices and restrictions on excavation of subsurface soil remaining above RGs.

For residential areas, placement of 2 feet of soil meeting the RGs would result in excavation and offsite disposal of much of the shallow (0-2 ft below ground surface) soil

contaminated above RGs. There are exceptions to the 2 foot removal requirement in areas adjacent to the foundation of buildings and other structures and around the base of trees. In these type of situations, less than two feet of soil could be removed to protect the structural integrity of buildings and to prevent damage to tree root systems. In addition, in areas where removal of contaminated soil below 2 feet would result in the complete removal of all soil contamination above RGs, excavation below 2 feet would be allowed to lessen the need for institutional controls.

The 2 feet of soil meeting the RGs in non-residential areas (e.g., the former Mary McLeod Bethune Elementary School) would be met by installation of a 2 foot thick cover, with excavation as needed for placement of the cover.

Soil below existing structures and roadways would not be removed. Potential exposure to contaminated subsurface soil is to be addressed through administrative notices and restrictions on excavation of subsurface soil.

Erosion of soils exceeding RGs and ash along the banks of Moncrief Creek is prevented in this alternative through stabilization of the banks of Moncrief Creek.

The estimated time to complete this alternative is 24 months.

The main components of this alternative are:

- Administrative notices and restrictions (i.e., **Institutional Controls**)
- Shallow soil excavation, offsite disposal and soil cover in residential areas
- Soil cover with excavation as needed in select non-residential areas (e.g., the former school)
- Solidification/stabilization, as needed for

proper offsite disposal

- Moncrief Creek bank stabilization

Alternative 4: Deep Excavation and Offsite Disposal

The RGs would be met under Alternative 4 by excavation of all soil exceeding RGs that is above the water table. Soil below existing structures and roadways would not be removed. To address subsurface soil remaining below structures, roadways, etc. and above RGs, administrative notices and restrictions on excavation would be utilized.

The estimated time to complete this alternative is 32 months.

The main components of this alternative are:

- Administrative notices and restrictions (i.e., **Institutional Controls**)
- Soil excavation and offsite disposal
- Solidification/stabilization, as needed for proper offsite disposal

EVALUATION OF ALTERNATIVES

To determine which alternative best eliminates or reduces risks posed by contaminated groundwater, EPA used the evaluation criteria described in Table 5 to evaluate the four alternatives. This section of the Proposed Plan profiles the relative performance of each alternative against the first seven criteria. The two remaining modifying criteria, state and community acceptance, are considered after comments received during the public comment period have been received.

The numerical ranking in Table 6 attempts to provide a relative relationship, on a scale of 1-4, of each alternative's performance under each criteria. The higher the number, the better the rating of that alternative for the criterion under consideration (i.e., 1 is the least favorable)). Some alternatives are deemed basically equivalent for certain criterion and carry the same rating.

TABLE 6. COMPARATIVE ANALYSIS OF REMEDIAL ALTERNATIVES				
Criterion	No Further Action (1)	Soil Cover with Excavation and Offsite Disposal (2)	Shallow Excavation, Offsite Disposal and Soil Cover (3)	Deep Excavation and Offsite Disposal (4)
1. Overall Protectiveness	1	2	3	4
2. Compliance with ARARS	1	2	3	3
3. Long-Term Effectiveness and Permanence	1	2	3	4
4. Reduction of Toxicity, Mobility, or Volume	1	2	3	4
5. Short-Term Effectiveness	1	3	2	4
6. Implementability	4	3	2	1
7. Present Worth Cost	\$50,000	\$11,100,000	\$20,400,000	\$43,000,000

PREFERRED ALTERNATIVE

EPA believes Alternative 3 (Shallow Excavation, Offsite Disposal and Soil Cover) is the most practical and efficient alternative and has the best chance of eliminating, controlling or significantly reducing risks at the Site (i.e., eliminating, controlling or reducing exposures to contamination above the RGs listed in Tables 1 and 2).

Implementation of Alternative 3 would include the following actions to address soil *which exceeds residential RGs*:

Residential Property

- Prevention of human exposure to surface soil is provided by soil removal as needed to allow for installation of a 2 foot thick soil cover. For the most part, this approach will result in the removal of any contamination in the upper 2 feet of soil to be followed by backfill with a 2 foot thick soil cover. Excavation of less than 2 feet is to be allowed adjacent to the foundation of buildings and other structures and around the base of trees.
- Prevention of potential human exposure to subsurface soil below 2 feet is provided by installation of the 2 foot thick soil cover and **Institutional Controls**. Where practical, excavation below 2 feet is to be allowed to lessen or eliminate the need for **Institutional Controls**.
- Prevention of potential human exposure to the contaminated soil footprint under existing buildings, roads, etc. is provided by **Institutional Controls**.

Former School Property (Developed Land)

- Prevention of human exposure to surface soil is provided by soil removal as needed to allow for installation of a 2 foot thick soil cover.
- Prevention of potential human exposure to subsurface soil is provided by installation of the 2 foot thick soil cover and **Institutional Controls**.
- Prevention of potential human exposure to the contaminated soil footprint under existing buildings, roads, etc. is provided by **Institutional Controls**.

Former School Property (Undeveloped Land) and Remaining Undeveloped Land (mostly found adjacent to the creek)

- Prevention of human exposure to surface soil is provided by soil removal as needed to allow for installation of a 2 foot thick soil cover.
- Prevention of potential human exposure to subsurface soil below 2 feet is provided by installation of the 2 foot thick soil cover and **Institutional Controls**.

Implementation of Alternative 3 would include the following actions to address soil, *which exceeds industrial RGs*, in industrial settings:

Industrial Property (including Residential Property designated to be redeveloped for Industrial Use)

- Prevention of human exposure to surface soil is provided by asphalt or concrete cover with soil removal as needed to provide minimum 2 feet of clean cover.
- Prevention of potential human exposure to subsurface soil below 2 feet is provided by installation of the 2 foot thick soil cover and **Institutional Controls**.

- Prevention of potential human exposure to the soil footprint under existing buildings, roads, etc. is provided by **Institutional Controls**.
- Prevention of potential future human exposure to the upper 2 feet of surface soil exceeding residential RGs from a change in land use is provided by **Institutional Controls**.

Implementation of Alternative 3 would include the following actions to control erosion and transport of contaminated bank soils into Moncrief Creek:

Moncrief Creek

- Stabilization of the banks of Moncrief Creek (e.g., clear banks, excavate soil to achieve acceptable sideslopes, dispose of excavated soil/material properly, installation of erosion controls to prevent erosion of ash/contamination into creek, etc.).

All actions which require any combination of cover installation and/or soil excavation include restoration activities (e.g., replacement of flower beds, small trees, shrubs, grass, etc.).

All actions that require excavation will also require characterization of the excavated soil to determine proper disposal (i.e., determination if the soil is hazardous or not hazardous from a disposal standpoint).

COMMUNITY PARTICIPATION

EPA has developed a community relations program as mandated by Congress under Superfund to respond to citizen's concerns and needs for information and to enable residents and public officials to participate

in the decision-making process. Public involvement activities undertaken at Superfund sites consist of interviews with local residents and elected officials, a community relations plan for each site, fact sheets, availability sessions, public meetings, public comment periods, newspaper advertisements, site visits, and any other actions needed to keep the community informed and involved.

EPA is conducting a **30-day public comment period from July 28, 2005, - August 28, 2005**, to provide an opportunity for public involvement in selecting the final cleanup method for the Brown's Dump Site. Public input on all alternatives, and on the information that supports the alternatives, is an important contribution to the remedy selection process. A public meeting is scheduled for **August 9, 2005, at the Clanzel T. Brown Center from 5:30 PM to 7:00 PM**. Because this Proposed Plan Fact Sheet provides only a summary description of the cleanup alternatives being considered, the public is encouraged to consult the **Information Repository** for a more detailed explanation.

During this 30-day comment period, the public is invited to review all site-related documents housed at the Information Repository located at Clanzel T. Brown Center, 4415 Moncrief Road, Jacksonville, Florida, and to offer comments to EPA either orally at the public meeting or in written form during the 30-day comment period. The actual remedial action could be different from the preferred alternative, depending upon new information or statements EPA may receive as a result of public comments.

If you prefer to submit written comments, please mail them postmarked no later than midnight **August 28, 2005** to:

L'Tonya Spencer
Community Involvement Coordinator
U.S.EPA, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-3014

All comments will be reviewed and a response prepared in making the final determination of the most appropriate alternative for cleanup/treatment of the Site. EPA's final choice of a remedy will be issued in a **Record of Decision (ROD)**. A document called a Responsiveness Summary summarizing EPA's response to all public comments will also be issued with the ROD. Once the ROD is signed by the Regional Administrator, it will become part of the **Administrative Record**, which contains all documents used by EPA in making a final determination of the best cleanup/treatment for the Site. Once the ROD has been approved, the City of Jacksonville and EPA will begin the design of the selected remedy.

**INFORMATION REPOSITORY
LOCATION**

Clanzel T. Brown Center
4415 Moncrief Road
Jacksonville, Florida 32209
(904) 764-8752

**FOR MORE INFORMATION ABOUT THE SITE OR
TO REQUEST A PUBLIC MEETING, PLEASE CONTACT:**

**Wesley S. Hardegree, Remedial Project Manager
Superfund Remedial and Technical Services Branch
Waste Division
61 Forsyth Street
Atlanta, Georgia 30303
Toll Free No.: 1 800 435-9234**

MAILING LIST

If you are not already on our mailing list and would like to be placed on the list to receive future information on the **Brown's Dump Site**, or if you want your name removed from the list, or if you have a change of address, please complete this form and return to L'Tonya Spencer, Community Involvement Coordinator at the above address:

NAME: _____

ADDRESS: _____

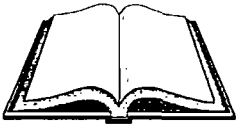
CITY, STATE, ZIP CODE: _____

PHONE NUMBER: _____

Addition ☐

Change of Address ☐

Deletion ☐



GLOSSARY

Administrative Record: Set of documents and data used in selecting cleanup remedies at NPL sites. The record is placed in the **information repository** to allow public access.

Institutional Controls: An Institutional Control is a non-engineered instrument that helps to minimize the potential for human exposure to contamination and/or protect the integrity of a remedy. Institutional Controls work by limiting land or resource use and/or by providing information that helps modify or guide human behavior at the sites. Examples of Institutional Controls include: local ordinance, deed notices, zoning restrictions, building or excavation permits, well drilling prohibitions, easements and covenants.

ARARs: Applicable or Relevant and Appropriate (federal and state) Requirements a selected remedy must meet.

CERCLA or Superfund: Federal law establishing and authorizing EPA to respond to abandoned or unregulated releases of hazardous waste.

Contaminants of concern (COCs): Individual constituents that the human health risk assessment has determined to present a probable risk to human health.

Contaminants of potential ecological concern (COPEC): Individual constituents that the ecological risk assessment has determined to present a possible risk to ecological health.

Groundwater: Water beneath the earth's surface which fills spaces between sand, soil, gravel or rock.

Information repository: Local files set up for public review of **Superfund** sites documents relevant to EPA activities.

National Contingency Plan (NCP): The NCP is the federal government's blueprint for responding to both oil spills and hazardous substance releases. The National Contingency Plan is the result of our country's efforts to develop a national response capability and promote overall coordination among the hierarchy of responders and contingency plans.

National Priorities List (NPL): EPA's list of hazardous waste sites eligible for attention under federal **Superfund** program.

Proposed Plan: This document summarizes for the public the preferred cleanup strategy, rationale for the preference, alternatives presented in the detailed analysis of the remedial investigation/feasibility study. It solicits public review and comment on all the alternatives under consideration.

Record of Decision (ROD): A ROD provides the justification for the remedial action (treatment) chosen at a Superfund site. It also contains site history, site description, site characteristics, community participation, enforcement activities, past and present activities, contaminated media, the contaminants present, scope and role of response action, and the remedy selected for cleanup.

Remedial Goals (RGs): RGs are used in the Feasibility Study to define the areas to which the cleanup objective(s) apply. During the Proposed Plan, the RGs can be thought of as proposed cleanup levels. The final cleanup levels for the Brown's Dump Site will be established in the ROD.



United States
Environmental Protection
Agency

Superfund Remedial and Technical Services Branch

Region 4
61 Forsyth St. SW
Atlanta, Georgia, 30303

Official Business
Penalty for Private Use
\$300

4 10 0017

Brown's Dump
SUPERFUND SITE
FACT SHEET

Place
Stamp

Name _____
Address _____
City _____ State ____ Zip ____

4 10 0018

L'Tonya Spencer, Community Relations Coordinator
Waste Management Division
U. S. EPA, Region 4
Atlanta Federal Center
61 Forsyth St, SW
Atlanta, GA 30303-3104